

**IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF TENNESSEE**

DAVID DELL’AQUILA, LORANNDA)	
BORJA, TODD CHESNEY, and BRENT)	
WEBER, on behalf of)	
themselves and all others similarly situated,)	
)	
Plaintiffs,)	
)	No: 3:19-CV-00679
- against -)	Judge William L. Campbell Jr.
)	
NATIONAL RIFLE ASSOCIATION)	Magistrate Judge Chip Frensley
OF AMERICA,)	
)	
)	
Defendant.)	

**DECLARATION OF WILLIAM A. BREWER IN SUPPORT OF THE NATIONAL
RIFLE ASSOCIATION OF AMERICA’S
MOTION TO DISMISS**

I, William A. Brewer, declare, pursuant to 28 U.S.C. § 1746, as follows:

1. I am an attorney with the law firm Brewer, Attorneys & Counselors, counsel for Defendant National Rifle Association of America (the “NRA”) in this action. I submit this declaration in support of the NRA’s Motion to Dismiss.

2. As counsel for the NRA, I have reviewed pleadings and other documents related to this matter, and I am familiar with the facts and circumstances of this case.

3. I am fully competent and qualified in all respects to make this Declaration. The facts stated herein are true and correct, and unless otherwise qualified, are within my personal knowledge.

4. In advance of filing this motion, I attempted to contact Plaintiffs’ counsel to ascertain Plaintiffs’ position regarding the relief sought.

5. On April 6, 2022, I called Elliot Schuchardt, who is listed as attorney of record for Plaintiffs, at 3:44pm E.T. I asked Mr. Schuchardt whether he still represents Plaintiffs.

6. In response, Mr. Schuchardt conveyed that he does not represent Plaintiffs. He referenced issues regarding his lack of admittance to this Court, the particulars of which I am unfamiliar and did not inquire further.

7. I stated that Defendant intended to move to dismiss the case pursuant for failure to prosecute. Mr. Schuchardt stated that his position would be to oppose the motion.

8. I declare under penalty of perjury that the foregoing is true and correct.
Executed this 11th day of April 2022.

/s/ William A. Brewer
William A. Brewer